



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

January 8, 2018

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
Docket ID No. EPA-HQ-OAR-2017-0355
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Maryland Department of Environment Comments on Repealing the Clean Power Plan

Dear Administrator Pruitt:

As Maryland's Secretary of the Environment, I am writing to express my concerns about the possible repeal of the Clean Power Plan. The Maryland Department of the Environment (MDE) opposes the repeal of the Clean Power Plan unless it is replaced with a policy that is as effective and enforceable as the Regional Greenhouse Gas Initiative (RGGI). I would also like to reiterate MDE's request that the Environmental Protection Agency (EPA) hold a public hearing in Annapolis or the Baltimore region on its proposal to repeal the Clean Power Plan, 82 Fed. Reg. 48,035 (October 16, 2017).

MDE recognizes that states are best positioned to establish their own environmental and energy policies, however there are clear advantages to regional cooperation when it comes to air quality and greenhouse gas reductions and federal support is needed to tackle these shared regional and global challenges. The Clean Power Plan is not perfect, and it creates some winners and losers. Nonetheless, Maryland and other RGGI participating states have demonstrated that carefully designed carbon dioxide (CO₂) emission limits on electricity generation can make states winners both environmentally and economically.

Maryland has been a national leader in responding to climate change and has taken significant actions, including:

- Passage of the Greenhouse Gas Reduction Act of 2016 that Governor Hogan signed into law and which requires a 40% in-state reduction of greenhouse gas emissions by 2030
- Passage of a law establishing the Maryland Commission on Climate Change which is a bipartisan commission focused on mitigation, adaptation, science and communication
- The Governor's creation of a grant program within the Department of Natural Resources to assist with resiliency and preparedness
- The Governor's recent investment of \$44 million for clean energy projects, including \$3 million for green jobs training
- Leading in the implementation and continued success of the Regional Greenhouse Gas Initiative, with a strong commitment to expansion and future pollution reduction

RGGI is a proven model to reduce greenhouse gas emissions from power plants in an economically beneficial way. The RGGI states have reduced emissions more rapidly than the rest of the country, while experiencing

faster economic growth. Independent analyses have concluded that RGGI has played a key role in reducing the region's emissions,¹ has generated substantial economic benefit, including job creation,² and has led to billions of dollars in improved public health outcomes.³

In addition to enabling other states to experience the same benefits that the RGGI participants have enjoyed, a strong federal program that is as effective and enforceable as RGGI would reduce emissions of co-pollutants in states upwind of Maryland, which are the primary driver of ozone pollution in Maryland.

Federal action is important to combat global climate change and also help level the playing field for states that are at risk environmentally and economically when neighboring jurisdictions are not as active in mitigating greenhouse gases or ozone pollution. Maryland is committed to working with our state and local partners to reduce "leakage" but we also need federal leadership to help reduce regional and international threats.

For these reasons, MDE opposes the repeal of the Clean Power Plan unless its replacement is as effective and enforceable as RGGI. Again, we request that prior to any action EPA hold a public hearing in Annapolis or the Baltimore region. It is pivotal that EPA have the benefit of hearing first hand from our residents, businesses, and communities about how the repeal will affect Maryland's progress and the importance of coordinated action to reduce greenhouse gas emission and air pollution. Thank you in advance for your consideration. Should you have any questions, please do not hesitate to contact me at (410) 537-4187.

Sincerely,

A handwritten signature in blue ink that reads "Ben Grumbles". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ben Grumbles
Secretary

¹ Murray, Brian C. and Peter T. Maniloff. "Why Have Greenhouse Emissions in RGGI States Declined? An Econometric Attribution to Economic, Energy Market, and Policy Factors." *Energy Economics*. August 2015.
<http://www.sciencedirect.com/science/article/pii/S0140988315002273>

² "The Economic Impacts of the Regional Greenhouse Gas Initiative on Nine Northeastern and Mid-Atlantic States." Analysis Group. July 2015.
http://www.analysisgroup.com/uploadedfiles/content/insights/publishing/analysis_group_rggi_report_july_2015.pdf

³ "Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative." Abt Associates, 2017.
<http://abtassociates.com/reports/2017/rggi.aspx>